

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ADAM ANKELE : CIVIL ACTION
Plaintiff :
v. :
MARCUS G. HAMBRICK, :
Defendant. : NO. 02-4004

DEFENDANT'S PROPOSED JURY QUESTIONS

1. Do you find that plaintiff has proven by a preponderance of the evidence that Trooper Marcus Hambrick lacked probable cause to charge plaintiff with violating Pennsylvania's motor vehicle code as a result of the accident on the evening of February 12, 2001?

YES _____ NO _____

2. Do you find that plaintiff has proven by a preponderance of the evidence that Trooper Marcus Hambrick knowingly provided materially false information upon which the Lehigh County Prosecutors' Office's relied in connection with its decision to try plaintiff for driving under the influence of alcohol?

YES _____ NO _____

If your answer to Question No's. 1 and 2 is "No", then stop and return to the Courtroom. If your answer to Question No. 1 or 2 is "Yes", then proceed to Question No. 3.

3. Do you find that plaintiff has proven by a preponderance of the evidence that he suffered an actual injury as a result of Trooper Hambrick's conduct, rather than his own conduct, to justify an award of compensatory damages?

YES _____ NO _____

If your answer to Question to No. 3 is "No", then stop and return to the Courtroom. If your answer to Question No. 3 is "Yes", proceed to Question No. 4.

4. We award the plaintiff compensatory damages in the amount of:

\$ _____